

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

SSA BONDS ANTITRUST LITIGATION

This Document Relates To All Actions

1:16-cv-03711-ER

**NOTICE OF DEFENDANTS'
MOTIONS TO DISMISS THE
CONSOLIDATED AMENDED
CLASS ACTION COMPLAINT**

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that the undersigned, attorneys for defendants Barclays Bank PLC, Barclays Capital Inc., Barclays Services Limited, Barclays Capital Securities Limited, BNP Paribas, BNP Paribas Securities Corp., Citigroup Inc., Citibank N.A., Citigroup Global Markets Inc., Citigroup Global Markets Limited, Crédit Agricole Corporate & Investment Bank, Credit Suisse AG, Credit Suisse Securities (USA) LLC, Credit Suisse Securities (Europe) Ltd., Credit Suisse International, HSBC Securities (USA) Inc., HSBC Bank plc, Nomura International plc, Nomura Securities International, Inc., Royal Bank of Canada, RBC Capital Markets, LLC, RBC Europe Limited, The Toronto-Dominion Bank, TD Securities Limited, and TD Securities (USA) LLC (together, the “Defendants”), in the above-referenced matter, will move the Court, before the Honorable Edgardo Ramos, United States District Judge for the Southern District of New York, 40 Foley Square, New York, New York, at a date and time to be determined by this Court, for an order pursuant to Rules 12(b)(1), 12(b)(2), 12(b)(3), and 12(b)(6) of the Federal Rules of Civil Procedure dismissing with prejudice, in whole or in part, the claims asserted in the Consolidated Amended Class Action Complaint (the “Complaint”).

The grounds for these motions are that the Complaint should be dismissed for lack of personal jurisdiction as to certain Defendants,¹ for lack of venue as to certain Defendants,² and for failure to state a claim upon which relief can be granted and lack of subject matter jurisdiction as to all Defendants. The specific grounds for Defendants’ motions to dismiss are set forth in the: (1) Memorandum of Law in Support of Dealer Defendants’ Motion to Dismiss the

¹ Those Defendants are: Barclays Bank PLC, Barclays Capital Securities Limited, Barclays Services Limited, BNP Paribas, Citigroup Global Markets Limited, Crédit Agricole Corporate & Investment Bank, Credit Suisse AG, Credit Suisse International, Credit Suisse Securities (Europe) Ltd., HSBC Bank plc, Nomura International plc, Royal Bank of Canada, RBC Europe Limited, The Toronto-Dominion Bank, and TD Securities Limited.

² Those Defendants are: Barclays Capital Securities Limited, Barclays Services Limited, Credit Suisse International, Credit Suisse Securities (Europe) Ltd., HSBC Bank plc, Nomura International plc, and TD Securities Limited.

Consolidated Amended Class Action Complaint for Lack of Subject Matter Jurisdiction and Failure to State a Claim³; (2) Supplemental Memorandum of Law in Support of the Barclays' Defendants' Motion to Dismiss the Consolidated Amended Class Action Complaint for Failure to State a Claim; (3) Supplemental Memorandum of Law in Support of the Citi Defendants' Motion to Dismiss the Consolidated Amended Class Action Complaint for Failure to State a Claim and the accompanying Declaration of Paul M. Eckles and Exhibits 1 and 2 thereto; (4) Crédit Agricole Corporate & Investment Bank's Supplemental Memorandum of Law in Support of Defendants' Motion to Dismiss the Consolidated Amended Class Action Complaint; (5) Supplemental Memorandum of Law in Support of the Credit Suisse Defendants' Motion to Dismiss the Consolidated Amended Class Action Complaint for Failure to State a Claim; (6) Supplemental Memorandum of Law in Support of the HSBC Defendants' Motion to Dismiss the Consolidated Amended Class Action Complaint; (7) Supplemental Memorandum of Law in Support of Nomura International plc's Motion to Dismiss the Consolidated Amended Class Action Complaint; (8) Supplemental Memorandum of Law in Support of Nomura Securities International, Inc.'s Motion to Dismiss the Consolidated Amended Class Action Complaint; (9) Royal Bank of Canada, RBC Capital Markets, LLC, and RBC Europe Limited's Supplemental Memorandum of Law in Support of Defendants' Motion to Dismiss the Consolidated Amended Class Action Complaint; (10) Supplemental Memorandum of Law of the TD Entities in Support of Their Motion to Dismiss the Consolidated Amended Class Action Complaint; and (11) Memorandum of Law in Support of Foreign Dealer Defendants' Motion to Dismiss the

³ Defendants adopt Plaintiffs' defined term "Dealer Defendants" for convenience for purposes of these motions only.

Consolidated Amended Class Action Complaint for Lack of Personal Jurisdiction and Improper Venue, Appendix 1 thereto, and the following accompanying declarations:

- (a) Declaration of David G. Januszewski, dated December 12, 2017, and Exhibits 1 to 11 thereto;
- (b) Declaration of Hannah Ellwood (Barclays Bank PLC), dated December 12, 2017;
- (c) Declaration of Victoria E.C. Hardy (Barclays Capital Securities Limited), dated December 12, 2017;
- (d) Declaration of Hannah Ellwood (Barclays Services Limited), dated December 12, 2017;
- (e) Declaration of Stephanie Gyetvan (BNP Paribas), dated December 12, 2017;
- (f) Declaration of Thomas Reich, dated December 11, 2017;
- (g) Supplemental Declaration of Gene Kim (Crédit Agricole Corporate & Investment Bank), dated December 11, 2017;
- (h) Declaration of David Quest (HSBC Bank plc), dated December 8, 2017;
- (i) Declaration of Nicola Black (HSBC Bank plc), dated December 11, 2017; and
- (j) Supplemental Declaration of Daisy Le Vay (Nomura International plc), dated December 12, 2017.

PLEASE TAKE FURTHER NOTICE that movants request oral argument of these motions.

Dated: December 12, 2017
New York, New York

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